

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:) Case No. 2:23bk53043
)
WELCOME GROUP 2, LLC) Judge C. Kathryn Preston
)
Debtor.) Chapter 11
)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

Tami Hart Kirby of the law firm of Porter Wright Morris & Arthur LLP, One South Main Street, Suite 1600, Dayton, Ohio 45402, hereby gives notice of her appearance in this matter as counsel for creditor RSS WFCM2019-C50 – OH WG2, LLC (“**Lender**”), as required under Rule 9010(b) of the Federal Rules of Bankruptcy Procedure and, pursuant to Rule 2002(g) of the Federal Rules of Bankruptcy Procedure, hereby requests that copies of all notices given or required to be given in this case and all papers and other pleadings filed, served or required to be served in this case be directed to Ms. Kirby at the address set forth herein, to wit:

Tami Hart Kirby, Esq.
Porter Wright Morris & Arthur LLP
One South Main Street, Suite 1600
Dayton, OH 45402-2028
Telephone: (937) 449-6721/Facsimile: (937) 449-6820
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Please take further notice that the forgoing request includes, without limitation, any and all notices in respect of any application, motion, petition, pleading, request, complaint, demand, order or any other paper filed in the within case, whether such other notice is formal or informal,

written or oral, and whether transmitted by hand-delivery, United States Mail, expedited delivery service, telephone, telecopy, e-mail or otherwise.

Please take further notice that neither this request for notice nor any subsequent appearance, pleading, proof of claim, or other writing or conduct shall constitute a waiver of any:

(a) rights to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court; (b) rights to trial by jury in any proceeding as to any and all matters so triable; (c) rights to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

(d) other rights, claims, actions, defenses, setoffs, recoupments, or other matters under any agreement, law or equity. All of such rights are hereby reserved and preserved, without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in this case.

Dated: September 5, 2023

Respectfully submitted,

/s/ Tami Hart Kirby

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*Attorneys for Creditor RSS WFCM2019-C50 – OH
WG2, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Notice of Appearance and Request for Service of Papers* was filed electronically on this 5th day of September, 2023, which will be served on the following ECF participants, electronically through the Court's ECF system at the email address registered with the Court:

Denis E. Blasius, Esq.
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Attorney for Debtor-in-Possession

Darlene E. Fierle, Esq.
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Springboro, Ohio 45066
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Assistant United States Trustee
Office of the US Trustee
170 North High Street, Suite 200
Columbus, Ohio 43215

and on the following by ordinary U.S. Mail addressed to:

Welcome Group 2, LLC
5955 E. Dublin Granville Road
New Albany, Ohio 43054
Debtor

/s/ Tami Hart Kirby
Attorneys for Creditor RSS WFCM2019-C50 – OH
WG2, LLC